

**CONESTOGA-ROVERS  
& ASSOCIATES**261 Martindale Road, Unit #3, St. Catharines, Ontario L2W 1A2  
Telephone: 905-682-0510 Facsimile: 905-682-8818  
www.CRAworld.com

October 6, 2003

US EPA RECORDS CENTER REGION 5



497006

Reference No. 32664

Mr. Brian Kelly  
On-Site Coordinator  
United States Environmental Protection Agency  
Emergency Response Branch  
9311 Groh Road, Room 216  
Grosse Ile, Michigan 48138

Dear Mr. Kelly

Re: Review of Air Monitoring Results  
Sybill, Inc. Site - Detroit, Michigan

In response your letter dated September 23, 2003, Conestoga-Rovers & Associates (CRA) has completed a comprehensive review of air monitoring data generated at the former Sybill, Inc. Site located at 111 Military Street in Detroit, Michigan (Site). The air monitoring data generated up to September 23, 2003 was reviewed at your request to confirm its validity.

CRA's review of the air monitoring records indicates that air monitoring equipment used at the Site has included a PPB RAE (volatile organic vapors), a Q RAE (four-gas meter) and an MIE Mini-RAM (aerosol monitor). You will recall that CRA started using the PPB RAE as a result of humidity issues associated with the use of other photolionization detectors (PIDs). This issue was identified and resolved by CRA's Health and Safety Officer (HSO).

CRA's review of the air monitoring data confirms that the above equipment was calibrated prior to its use at the beginning of each day. The calibration was conducted by the HSO in accordance with equipment manufacturer requirements and documented in files maintained at the Site by CRA's HSO. Review of the air monitoring data also confirms that background air monitoring has been conducted at the beginning of the work day prior to commencing Removal Action activities at the Site.

It is noted that air monitoring results conducted by CRA's HSO have yielded consistently similar results to those generated concurrently by US EPA's START contractor. Further, SUMMA air sampling conducted on September 3, 2003 yielded results consistent with those generated from on-Site air monitoring activities that day. It is also noted here that on August 12, 2003, the HSO shut down operations at the Site due to elevated volatile organic vapors detected in air during routine monitoring activities. Although the elevated volatile organic vapor measurements were determined not to be attributable to Site operations, the fact that the HSO shut down Site operations demonstrates the HSO's familiarity with the Work Plan early in the project and his responsibility to take decisive action based on air monitoring results.



Worldwide Engineering, Environmental, Construction, and IT Services

**CONESTOGA-ROVERS  
& ASSOCIATES**

October 6, 2003

2

Reference No. 32264

In summary, CRA's comprehensive review of air monitoring conducted at the Site confirms the following:

- that the air monitoring equipment has been properly calibrated at the beginning of the work day prior to its use;
- that background air monitoring has been conducted at the beginning of the work day prior to commencement of Site activities;
- that air monitoring conducted by CRA's HSO has yielded similar results to those generated from SUMMA air sampling; and
- that air monitoring conducted by CRA's HSO has yielded similar results to those generated by US EPA's START contractor.

Based on the foregoing, the air monitoring data generated by CRA's HSO is considered valid.

Should you have any questions or require anything further, please do not hesitate to contact the undersigned.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Marc Gaudet, P. Eng.

EMF/3/Det.

c.c.: Bob Schloesser, CRA  
Liz Faler, CRA  
Russell Aylsworth, CRA